

★ ANGUS KING ★

SECRETARY OF THE SENATE
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November 4, 2014

Secretary of the Senate
Office of Public Records
232 Senate Office Building
Washington, DC 20510-7116

REFERENCE: RESPONSE TO IDENTIFICATION NUMBERS: C00516047,
YEAR-END REPORT (10/01/2013 - 12/31/2013)
APRIL QUARTERLY REPORT (01/01/2014 - 03/31/2014)
JULY QUARTERLY REPORT (04/01/2014 - 06/30/2014)

Dear Sir or Madam:

This responds to the three letters dated October 1, 2014 from Chris Jones, FEC Campaign Finance Analyst, requesting additional backup detail on candidate in-kind contributions listed in the Campaign's 2013 Year End Report (10/01/2013 - 12/31/2013) and April Quarterly Report (01/01/2014 - 03/31/2014), and requesting additional back-up detail on candidate in-kind contributions and totals corrections in the July Quarterly Report (04/01/2014 - 06/30/2014). Our response is timely filed by the November 5, 2014 response deadline.

Enclosed please find amended reports for each of the three periods listed above, providing the additional back-up detail on the candidate's in-kind contributions for the three periods, and corrections to address the total discrepancy noted by Chris Jones in the July Quarterly Report. The reports have been submitted in full, given the many new small Memo Entries for the underlying vendors.

To ensure consistency, we have undertaken the extra effort to review all the reports back to the beginning of the election cycle and found a few candidate in-kind contributions that would also need the back-up detail and are filing amendments to those reports as well in order to ensure consistent methodology. Those reports include: the Campaign's 2013 April Quarterly Report (01/01/2013 - 03/31/2013), 2013 July Quarterly Report (04/04/2013 - 6/30/2013), 2013 October Quarterly Report (07/01/2013 - 9/30/13).

In each of the amended reports, we have implemented the reporting methodology discussed in detail with Chris Jones in preparation for filing this response and the amended reports. For ASK's in-kind contributions, we have deleted the original in-kind contribution entry and then made three new entries:

[A] Schedule A - entry of the in-kind contribution from ASK.

[B] Schedule B - entry of an offsetting disbursement for each in-kind contribution which nets out the effect of the in-kind contribution on cash totals, but both figures are still counted in the cumulative receipts and disbursements categories.

[C] Schedule B - entry of a "memo" entry for each vendor tied to any candidate in-kind contribution, allowing the background data to be provided to the FEC without adding the transaction to the disbursement totals in the report. These are net zero entries from a financial standpoint.

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